

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

BLOOM ENERGY CORPORATION,	§	
	§	
Plaintiff	§	
	§	
v.	§	CIVIL ACTION NO. 2:21-cv-101
	§	
PLANSEE SE and GLOBAL TUNGSTEN	§	JURY TRIAL DEMANDED
AND POWDERS CORP.,	§	
	§	
Defendants.	§	
	§	

PLAINTIFF'S MOTION FOR LEAVE TO FILE COMPLAINT UNDER SEAL

Plaintiff Bloom Energy Corporation (“Bloom”) hereby requests leave to file its Complaint against Plansee SE and Global Tungsten and Powders Corporation (collectively, “Defendants”) under seal, pursuant to Federal Rule of Civil Procedure 5.2 and Local Rule CV-5(a)(7) of the United States District Court of the Eastern District of Texas. The Complaint needs to be filed under seal as it refers to the terms of several confidential license agreements, and to a confidential proceeding, as well as confidential business information, business practices, business relationships, and communications, amongst others.

For the foregoing reasons, Bloom respectfully requests that the Court grant this Motion and permit the filing of Bloom’s Complaint under seal. A proposed order is submitted herewith.

DATED: April 3, 2022

Respectfully submitted,

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